

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---------------------------------|---|-------------------------|
| JOSEPH MORGAN, |) | |
| |) | |
| Plaintiff, |) | Case No.: 1:23-cv-06107 |
| |) | |
| vs. |) | Judge Kocoras |
| |) | |
| SILVER FINANCIAL CAPITAL, INC., |) | |
| |) | |
| Defendant. |) | |

PLAINTIFF JOSEPH MORGAN'S ITEMIZATION OF FEES

Pursuant to this Court's Order of November 29, 2023 (ECF 16), Plaintiff Joseph Morgan ("Plaintiff") submits the following itemization of fees incurred in connection with his Motion to Remand and for Attorney's Fees ("Motion to Remand") (ECF 6):

| Date | Task | Staff | Duration (hrs.) | Rate | Charge |
|------------------|--|---------------------------|-----------------|---------|------------|
| August 28, 2023 | Prepare draft Motion to Remand, research regarding same | Matthew Goldstein | 1.8 | \$360 | \$648.00 |
| August 28, 2023 | Revise draft Motion to Remand | Daniel A. Edelman | 1 | \$700 | \$700.00 |
| October 9, 2023 | Prepare Reply in Support of Motion to Remand | Matthew Goldstein | .3 | \$360 | \$108.00 |
| October 9, 2023 | Review Reply in Support of Motion to Remand, approve filing same | Tara Goodwin | .1 | \$600 | \$60.00 |
| October 9, 2023 | Circulate Reply in Support of Motion to Remand for approval to file, file same | Daniele Mazar (paralegal) | .2 | \$125 | \$25.00 |
| October 27, 2023 | Prepare Second Reply in Support of Motion to Remand | Daniel A. Edelman | 1.5 | \$1,050 | \$1,050.00 |
| October 28, 2023 | Revise Second Reply in Support of Motion to Remand, research regarding same | Daniel A. Edelman | 1 | \$700 | \$700.00 |
| October 29, 2023 | Review Second Reply in Support of Motion to Remand, approve filing same | Tara Goodwin | .1 | \$600 | \$60.00 |

| | | | | | |
|------------------|--|---------------|----|----------------------|-------------------|
| October 30, 2023 | Prepare Appendix to Second Reply in Support of Motion to Remand | Daniele Mazar | .1 | \$125 | \$12.50 |
| October 31, 2023 | Circulate Second Reply in Support of Motion to Remand for approval to file, filed same | Daniele Mazar | .2 | \$125 | \$25.00 |
| | | | | Total Charge: | \$3,388.50 |

The above hourly rates are the usual and customary rates charged for each of the above individuals. As reflected above, Plaintiff's counsel has incurred \$3,388.50 in attorney's fees in connection with his Motion to Remand (ECF 6), and respectfully requests that the Court award him \$3,388.50. Plaintiff attaches the Declaration of Daniel A. Edelman (Exhibit A) in support of his request. Plaintiff does not request that the Court award any costs.

Respectfully submitted,

/s/ Daniel A. Edelman

Daniel A. Edelman

Daniel A. Edelman
Tara L. Goodwin
Matthew J. Goldstein
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CERTIFICATE OF SERVICE

I, Daniel A. Edelman, hereby certify that on Tuesday, December 12, 2023, I caused a true and accurate copy of the foregoing document to be filed via the court's CM/ECF online system, which sent notice via email to all counsel of record.

/s/ Daniel A. Edelman
Daniel A. Edelman

Daniel A. Edelman
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Matthew J. Goldstein
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